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Federal Defenders OF NEW YORK, INC.

52 Duane Street-10th Floor, New York, NY 10007 Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director
and Attorney-in-Chief

APPLICATION GRANTED SO ORDERED A. VERNON S. BRODERICK U.S.D.J. 2/7/2020

BY ECF AND EMAIL

Honorable Vernon S. Broderick United States District Judge Southern District of New York 40 Foley Square, Room 415 New York, New York 10007 Sentencing in this matter is adjourned to May 8, 2020 at 3:30 p.m.

Re: United States v. Keenan Carroll 19 Cr. 488 (VSB)

Dear Judge Broderick:

I write to respectfully request an adjournment of Mr. Carroll's sentencing hearing to allow counsel to obtain a psychological evaluation for sentencing. Mr. Carroll is currently scheduled to be sentenced on February 27, 2020. We seek an adjournment of approximately 60 days. I have spoken with Kedar S. Bhatia, Esq. on behalf of the Government, and he has consented to this application.

When Mr. Carroll was interviewed by Probation for his Presentence Report, he reluctantly and emotionally disclosed for the first time,

Based on these disclosures, which are revealed in the first draft of the Presentence Report, a psychological evaluation is warranted and essential for the Court's consideration.

Thank you for your consideration of this matter.

Respectfully submitted,

Robert M. Baum

Assistant Federal Defender

SO ORDERED:

HONORABLE VINCENT S. BRODERICK United States District Judge

cc: Kedar S. Bhatia, Esq.
Assistant United States Attorney

52 Duane Street-10th Floor, New York, NY 10007 Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director
and Attorney-in-Chief

February 5, 2020

BY ECF AND EMAIL

Honorable Vernon S. Broderick United States District Judge Southern District of New York 40 Foley Square, Room 415 New York, New York 10007

Re: <u>United States v. Keenan Carroll</u> 19 Cr. 488 (VSB)

Dear Judge Broderick:

I write to respectfully request an adjournment of Mr. Carroll's sentencing hearing to allow counsel to obtain a psychological evaluation for sentencing. Mr. Carroll is currently scheduled to be sentenced on February 27, 2020. We seek an adjournment of approximately 60 days. I have spoken with Kedar S. Bhatia, Esq. on behalf of the Government, and he has consented to this application.

When Mr. Carroll was interviewed by Probation for his Presentence Report, he reluctantly and emotionally disclosed for the first time, a history of abuse, both sexual and physical. Based on these disclosures, which are revealed in the first draft of the Presentence Report, a psychological evaluation is warranted and essential for the Court's consideration.

Thank you for your consideration of this matter.

Respectfully submitted,

Robert M. Baum

Assistant Federal Defender

SO ORDERED:

HONORABLE VINCENT S. BRODERICK United States District Judge

cc: Kedar S. Bhatia, Esq.
Assistant United States Attorney